

KARISH & BJORGUM, PC

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Attorneys for Movant

UNITED STATES DISTRICT COURT**IN AND FOR THE CENTRAL DISTRICT OF CALIFORNIA**

In Re:

DMCA SUBPOENA TO

CLOUDFLARE, INC.,

Case No. 2:24-mc-00084-JFW-PVC

**STIPULATION TO EXTEND
BRIEFING ON MOTION TO
QUASH AND FOR PROTECTIVE
ORDER ON DMCA SUBPOENA****[Proposed Order Attached]****Judge: Hon. Pedro V. Castillo****Date: N/A**

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2 Whereas, on July 15, 2024, this Court issued to Movant PCR Distributing,
3 Inc. a subpoena directed to Cloudflare, Inc. under the Digital Millenium Copyright
4 Action (DMCA) (Dkt. No. 5) seeking information regarding the Operators of the
5 website nhentai.net;

6 Whereas, Movant states that it duly served that subpoena;

7 Whereas, on July 18, 2024, Plaintiff's counsel received an email from
8 Jennfier Rynell of Wilson Whitaker Rynell, attorneys for nhentai.net ("Intervenor"),
9 regarding motion practice or a possible resolution on the subpoena;

10 Whereas, the parties did not reach a resolution, so Intervenor filed a motion to
11 intervene for the purposes of seeking a motion to quash, for protective order, and for
12 a stay of the deadline in the subpoena;

13 Whereas, the Motion was assigned to Magistrate Judge Pedro V. Castillo,
14 who issued an order on July 26, 2024 granting the motion to intervene and to stay
15 the deadline in the subpoena pending further briefing on Intervenor's remaining
16 requested relief, with Movant's response being due August 9, 2024 and Intervenor's
17 reply due August 16, 2024;

18 Whereas, Movant states that its client has been traveling, and the parties
19 continue to consider resolutions to this matter; and

20 Whereas, on August 8, 2024, Movant's counsel and Intervenor's counsel
21 agreed to a two-week extension of all dates;

22 Therefore, it is stipulated by and among counsel for Movant and Intervenor
23 that Movant shall have until August 23, 2024 to file its response, and Intervenor
24 shall have until August 30, 2024 to file its reply.
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1 Dated: August 9, 2024

Respectfully submitted,

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By: /s/ Eric Bjorgum

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Eric Bjorgum

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KARISH & BJORGUM PC

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Attorneys for Movant

7 Dated: August 9, 2024

Respectfully submitted,

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By: /s/ Jennifer Rynell

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Jennifer Rynell

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WILSON WHITAKER RYNELL

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Attorneys for Intervenor

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